

DENNIS J. HERRERA (139669)  
City Attorney  
RONALD P. FLYNN (184186)  
Chief Deputy City Attorney  
YVONNE R. MERE (173594)  
Chief of Complex & Affirmative Litigation  
OWEN J. CLEMENTS (141805)  
SARA J. EISENBERG (269303)  
JAIME M. HULING DELAYE (270784)  
Deputy City Attorneys  
Fox Plaza  
1390 Market Street, Sixth Floor  
San Francisco, CA 94102  
Telephone: 415/554-3944  
415/437-4644 (fax)  
owen.clements@sfcityatty.org

Attorneys for Plaintiffs the City and County of San Francisco, California  
and the People of the State of California, acting by and through San  
Francisco City Attorney Dennis J. Herrera

[Additional counsel appear on signature page.]

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

THE CITY AND COUNTY OF SAN FRANCISCO, CALIFORNIA and THE PEOPLE OF THE STATE OF CALIFORNIA,	)	Case No. 3:18-cv-7591-CRB
Acting by and through San Francisco City Attorney DENNIS J. HERRERA,	)	<u>CLASS ACTION</u>
	)	PLAINTIFFS' PROPOSED DISCOVERY SCHEDULE
Plaintiffs,	)	
vs.	)	JUDGE: Hon. Charles R. Breyer
PURDUE PHARMA L.P., et al.,	)	
Defendants.	)	

1 Pursuant to this Court’s order during the case management conference that took place on  
2 February 26, 2020, Plaintiffs the City and County of San Francisco, California (“San Francisco”)  
3 and the People of the State of California, acting by and through San Francisco City Attorney  
4 Dennis J. Herrera (the “People”) (collectively, “Plaintiffs”), hereby submit the following proposed  
5 discovery schedule.

6 Plaintiffs recognize that this case must move swiftly because of the egregious nature of the  
7 allegations, the urgent need for resolution of the claims and abatement of the opioid epidemic  
8 through injunctive and monetary relief as ultimately deemed appropriate by the finder of fact, and  
9 the action’s unique role as a bellwether for thousands of similar cases. Accordingly, Plaintiffs  
10 propose the schedule herein, recognizing it is aggressive in pace. Plaintiffs are prepared to move  
11 as expeditiously as possible to take and produce discovery and believe the following schedule is  
12 manageable so long as certain reasonable and appropriate limitations and efficiencies are put into  
13 place and any new discovery disputes (not previously resolved in the MDL) are resolved quickly.  
14 For example, Plaintiffs are prepared to meet and confer with Defendants immediately regarding  
15 the identities of custodians and search terms and to identify their top 20 highest-priority document  
16 custodians by as early as April 15, 2020. Plaintiffs will begin producing relevant documents for  
17 those custodians as soon as possible on a rolling basis. Any additional document custodians sought  
18 by Defendants over and above 25 should require leave of Court. Plaintiffs will also identify for  
19 Defendants the contents of certain databases that, pursuant to a long-scheduled and costly plan,  
20 are currently slated to be decommissioned in the coming months. Plaintiffs will work with  
21 Defendants to ensure that relevant reports from those databases are preserved before they are  
22 rendered inaccessible. Plaintiffs will require Defendants’ cooperation early on in the discovery  
23 process to ensure the identification and preservation of the relevant documents from those  
24 databases.<sup>1</sup>

---

26 <sup>1</sup> Plaintiffs also note that recent events related to the Coronavirus have had a substantial impact  
27 on San Francisco’s ability to operate business as usual. Assuming that these effects are relatively  
28 short lived, Plaintiffs anticipate being able to keep pace with the schedule set forth herein. If,  
however, the situation worsens, Plaintiffs may need to revisit the proposed schedule.

So long as Plaintiffs are not required to produce vast amounts of documents from non-essential custodians, and Defendants themselves produce relevant responsive documents in a timely manner, Plaintiffs anticipate being able to meet the following schedule:

Discovery Deadline	Date
Commencement of Discovery	April 1, 2020
Discovery Cutoff	October 30, 2020
Deadline for Exchange of Expert Reports by All Parties	November 16, 2020
Close of Expert Fact Discovery	December 23, 2021
Deadline for <i>Daubert</i> and Dispositive Motions	January 29, 2021
Deadline for Responses to <i>Daubert</i> and Dispositive Motions	February 26, 2021
Deadline for Replies in Support of <i>Daubert</i> and Dispositive Motions	March 5, 2021
All Trial Materials Due	March 12, 2021
Final Pretrial Hearing	March 19, 2021
Trial	March 29, 2021

DATED: March 13, 2020

ROBBINS GELLER RUDMAN  
& DOWD LLP  
AELISH M. BAIG  
MATTHEW S. MELAMED  
HADIYA K. DESHMUKH

s/ Aelish M. Baig  
AELISH M. BAIG

Post Montgomery Center  
One Montgomery Street, Suite 1800  
San Francisco, CA 94104  
Telephone: 415/288-4545  
415/288-4534 (fax)  
aelishb@rgrdlaw.com  
mmelamed@rgrdlaw.com  
hdeshmukh@rgrdlaw.com

DENNIS J. HERRERA  
City Attorney  
RONALD P. FLYNN  
YVONNE R. MERE  
OWEN J. CLEMENTS  
SARA J. EISENBERG  
JAIME M. HULING DELAYE  
Deputy City Attorneys  
Fox Plaza  
1390 Market Street, Sixth Floor  
San Francisco, CA 94102  
Telephone: 415/554-3944  
415/437-4644 (fax)  
owen.clements@sfcityatty.org

1 ROBBINS GELLER RUDMAN  
2 & DOWD LLP  
3 PAUL J. GELLER  
4 MARK J. DEARMAN  
5 DOROTHY P. ANTULLIS  
6 120 East Palmetto Park Road, Suite 500  
7 Boca Raton, FL 33432  
8 Telephone: 561/750-3000  
9 561/750-3364 (fax)  
10 pgeller@rgrdlaw.com  
11 mdearman@rgrdlaw.com  
12 dantullis@rgrdlaw.com

13 ROBBINS GELLER RUDMAN  
14 & DOWD LLP  
15 THOMAS E. EGLER  
16 CARISSA J. DOLAN  
17 655 West Broadway, Suite 1900  
18 San Diego, CA 92101  
19 Telephone: 619/231-1058  
20 619/231-7423 (fax)  
21 tome@rgrdlaw.com  
22 cdolan@rgrdlaw.com

23 LIEFF, CABRASER, HEIMANN  
24 & BERNSTEIN, LLP  
25 ELIZABETH J. CABRASER  
26 275 Battery Street, 29th Floor  
27 San Francisco, CA 94111-3339  
28 Telephone: 415/956-1000  
415/956-1008 (fax)  
ecabraser@lchb.com

LIEFF, CABRASER, HEIMANN  
& BERNSTEIN, LLP  
PAULINA DO AMARAL  
250 Hudson Street, 8th Floor  
New York, NY 10013  
Telephone: 212/355-9500  
212/355-9592 (fax)  
pdoamaral@lchb.com

RENNE PUBLIC LAW GROUP  
LOUISE RENNE  
350 Sansome Street, Suite 300  
San Francisco, CA 94104  
Telephone: 415/848-7240  
415/848-7230 (fax)  
lrenne@publiclawgroup.com

1 ANDRUS ANDERSON LLP  
2 JENNIE LEE ANDERSON  
3 AUDREY SIEGEL  
4 155 Montgomery Street, Suite 900  
5 San Francisco, CA 94104  
6 Telephone: 415/986-1400  
415/986-1474 (fax)  
jennie@andrusanderson.com  
audrey.siegel@andrusanderson.com

7 SANFORD HEISLER SHARP, LLP  
8 KEVIN SHARP  
9 611 Commerce Street, Suite 3100  
10 Nashville, TN 37203  
Telephone: 615/434-7000  
615/434-7020 (fax)  
ksharp@sanfordheisler.com

11 SANFORD HEISLER SHARP, LLP  
12 EDWARD CHAPIN  
13 655 West Broadway, Suite 1700  
14 San Diego, CA 92101  
Telephone: 619/577-4253  
619/577-4250 (fax)  
echapin2@sanfordheisler.com

15 CASEY GERRY SCHENK FRANCAVILLA  
16 BLATT & PENFIELD LLP  
17 DAVID S. CASEY, JR.  
18 GAYLE M. BLATT  
19 ALYSSA WILLIAMS  
20 110 Laurel Street  
San Diego, CA 92101-1486  
Telephone: 619/238-1811  
619/544-9232 (fax)  
dcasey@cglaw.com  
gmb@cglaw.com  
awilliams@cglaw.com

22 WEITZ & LUXENBERG P.C.  
23 ELLEN RELKIN  
24 PAUL PENNOCK  
25 700 Broadway  
New York, NY 10003  
Telephone: 212/558-5500  
212/344-5461 (fax)  
erelkin@weitzlux.com  
ppennock@weitzlux.com

1 WEITZ & LUXENBERG P.C.  
2 MELINDA DAVIS NOKES  
3 1880 Century Park East  
4 Los Angeles, CA 90067  
5 Telephone: 310/247-0921  
6 310/786-9927 (fax)  
7 mnokes@weitzlux.com

8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
Attorneys for Plaintiffs The City and County of  
San Francisco, California and The People of the  
State of California, acting by and through San  
Francisco City Attorney Dennis J. Herrera

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on March 13, 2020, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ Aelish M. Baig

AELISH M. BAIG

ROBBINS GELLER RUDMAN

& DOWD LLP

Post Montgomery Center

One Montgomery Street, Suite 1800

San Francisco, CA 94104

Telephone: 415/288-4545

415/288-4534 (fax)

E-mail: aelishb@rgrdlaw.com

## Mailing Information for a Case 3:18-cv-07591-CRB City and County of San Francisco et al v. Purdue Pharma L.P. et al

### Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Scott Manzoor Ahmad**  
SAhmad@winston.com
- **Jennie Lee Anderson**  
jennie@andrusanderson.com,Danielle.Kidd@andrusanderson.com,joann.pham@andrusanderson.com,elizabeth.lyons@andrusanderson.com,audrey.siegel@andrusanderson.com
- **Dorothy P. Antullis**  
dantullis@rgrdlaw.com,e\_file\_sd@rgrdlaw.com,e\_file\_fl@rgrdlaw.com
- **Aelish Marie Baig**  
AelishB@rgrdlaw.com,mmelamed@rgrdlaw.com,mbacci@rgrdlaw.com,e\_file\_sd@rgrdlaw.com
- **Sarah Jane Bily**  
SBily@winston.com
- **Gayle M Blatt**  
gmb@cglaw.com
- **Steven J. Boranian**  
sboranian@reedsmith.com,drothschild@reedsmith.com
- **Stephen Brody**  
sbrody@omm.com,steve-brody-4796@ecf.pacerpro.com
- **Kevin R. Budner**  
kbudner@lchb.com,tlim@lchb.com
- **Elizabeth J. Cabraser**  
ecabraser@lchb.com
- **Elizabeth Joan Cabraser**  
ecabraser@lchb.com,mtashima@lchb.com,abertram@lchb.com,jremuska@lchb.com
- **David S. Casey , Jr**  
dcasey@cglaw.com,camille@cglaw.com,sleonard@cglaw.com,jdavis@cglaw.com
- **Jennifer Machlin Cecil**  
jcecil@winston.com,ecf\_sf@winston.com,jen-machlin-cecil-9607@ecf.pacerpro.com
- **Edward D. Chapin**  
echapin2@sanfordheisler.com,fsalazar@sanfordheisler.com,jalvarez@sanfordheisler.com
- **Owen J. Clements**  
owen.clements@sfcityatty.org,catheryn.daly@sfcityatty.org
- **James M Davis**  
jdavis@cglaw.com,vicki@cglaw.net
- **Cari K. Dawson**  
cari.dawson@alston.com,kate.smith@alston.com
- **Mark Dearman**  
mdearman@rgrdlaw.com,e\_file\_sd@rgrdlaw.com,MDearman@ecf.courtdrive.com,e\_file\_fl@rgrdlaw.com
- **Mark J. Dearman**  
mdearman@rgrdlaw.com
- **Hadiya Khan Deshmukh**  
hdeshmukh@rgrdlaw.com
- **Carissa Jasmine Dolan**  
cdolan@rgrdlaw.com,e\_file\_sd@rgrdlaw.com
- **Thomas Edward Egler**  
tome@rgrdlaw.com,e\_file\_sd@rgrdlaw.com,e\_file\_sf@rgrdlaw.com
- **Sara Jennifer Eisenberg**  
sara.eisenberg@sfcityatty.org,john.cote@sfcityatty.org,alison.wong.lambert@sfcityatty.org,martina.hassett@sfcityatty.org,yvonne.mere@sfcityatty.org,catheryn.daly@sfcityatty.org
- **Tiffany Rose Ellis**  
tellis@weitzlux.com,nhryczyk@weitzlux.com
- **Christopher Blair Essig**  
CEssig@swinston.com



- **Wendy West Feinstein**  
wendy.feinstein@morganlewis.com,tammy.miller@morganlewis.com,picalendar@morganlewis.com,tamara.giulianelli@morganlewis.com
- **Paul J. Geller**  
pgeller@rgrdlaw.com,swinkles@rgrdlaw.com,e\_file\_fl@rgrdlaw.com
- **Patricia Camille Guerra**  
camille@cglaw.com
- **August P. Gugelmann**  
august@smllp.law,august@ecf.courtdrive.com
- **Richard Martin Heimann**  
rheimann@lchb.com
- **Dennis J. Herrera**  
cityattorney@sfcityatty.org,brittany.feitelberg@sfcityatty.org
- **Zachary Hill**  
zachary.hill@morganlewis.com,wendy.feinstein@morganlewis.com,rebecca.hillyer@morganlewis.com,evan.jacobs@morganlewis.com
- **Jaime Marie Huling Delaye**  
jaime.hulingdelaye@sfcityatty.org,alison.wong.lambert@sfcityatty.org,martina.hassett@sfcityatty.org,catheryn.daly@sfcityatty.org
- **Traci Janelle Irvin**  
traci.irvin@ropesgray.com,courtalert@ropesgray.com
- **Sarah Barr Johansen**  
sjohansen@reedsmith.com,aswenson@reedsmith.com
- **Timothy William Knapp**  
tknapp@kirkland.com
- **Amy Jean Laurendeau**  
alaurendeau@omm.com,amy-laurendeau-9969@ecf.pacerpro.com,sstewart@omm.com
- **Jennifer Gardner Levy**  
jennifer.levy@kirkland.com
- **Charles Coleman Lifland**  
clifland@omm.com,charles-lifland-4890@ecf.pacerpro.com
- **John David Lombardo**  
John.Lombardo@arnoldporter.com,guadalupe.saldana@arnoldporter.com,ecalendar@arnoldporter.com,William.Costley@arnoldporter.com
- **Amy Lucas**  
alucas@omm.com,amy-lucas-1835@ecf.pacerpro.com
- **Enu A Mainigi**  
emainigi@wc.com
- **Matthew Seth Melamed**  
mmelamed@rgrdlaw.com,e\_file\_SD@rgrdlaw.com
- **Yvonne Rosil Mere**  
yvonne.mere@sfcityatty.org,martina.hassett@sfcityatty.org
- **Andrew Miller**  
amiller@sanfordheisler.com
- **Sean OLeary Morris**  
sean.morris@arnoldporter.com,edocketscalendaring@arnoldporter.com,vincent.esparza@arnoldporter.com,stacie.james@arnoldporter.com,rebecca.mcnew@arnoldpor
- **Melinda Davis Nokes**  
mnokes@weitzlux.com,lschultz@weitzlux.com,rcerci@weitzlux.com,dsavours@weitzlux.com
- **Paul F. Novak**  
pnovak@weitzlux.com,cgarcia@weitzlux.com,nhryczyk@weitzlux.com
- **Michael Alexander Onufer**  
michael.onufer@kirkland.com
- **Louise Hornbeck Renne**  
lrenne@publiclawgroup.com,kbeaton@publiclawgroup.com,RPLG-docket@publiclawgroup.com
- **Nathan E. Shafroth**  
nshafroth@cov.com,rvantassell@cov.com,ktrempey@cov.com,echiulos@cov.com,rflu@cov.com,isaac-chaput-8316@ecf.pacerpro.com,ncutright@cov.com
- **Audrey Claire Siegel**  
audrey.siegel@andrusanderson.com
- **Reid Smith**  
RFSmith@winston.com

- **Elizabeth Anne Sperling**  
elizabeth.sperling@alston.com,annie.yu@alston.com
- **Karl Anton Stampfl**  
karl.stampfl@kirkland.com
- **Sabrina Heron Strong**  
sstrong@omm.com,sabrina-strong-4823@ecf.pacerpro.com
- **Edward W. Swanson**  
ed@smllp.law,AmyMcGugian@ecf.courtdrive.com,ed@ecf.courtdrive.com,britt@ecf.courtdrive.com
- **Russell E Taylor**  
rtaylor@fbm.com
- **Rocky C. Tsai**  
rocky.tsai@ropesgray.com,CourtAlert@RopesGray.com
- **Richard Allen VanDuzer**  
rvanduzer@fbm.com,jamante@fbm.com,calendar@fbm.com
- **Neelum Jane Wadhvani**  
nwadhvani@wc.com,CardinalWVParalegals@wc.com
- **Donna Marie Welch**  
dwelch@kirkland.com
- **Alyssa M Williams**  
awilliams@cglaw.com
- **Sonya Diane Winner**  
swinner@cov.com,calsbury@cov.com
- **Carl Brandon Wisoff**  
bwisoff@fbm.com,mzappas@fbm.com,calendar@fbm.com
- **Douglas R. Young**  
dyoung@fbm.com,calendar@fbm.com
- **Paulina do Amaral**  
pdoamaral@lchb.com

### Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

**Paul Laprairie**  
Andrus Anderson LLP  
155 Montgomery Street, 900  
San Francisco, CA 94104